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December 29, 1992

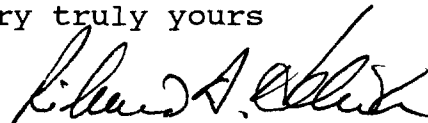
Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Washington, D.C. 20554

Dear Ms. Searcy

Submitted on behalf of William E. Stamps, Sr. and Patricia R. Stamps, dba Let's Talk Radio, licensee of FM Broadcast Station KPOD-FM, Crescent North, California, are an original and four copies of a Petition for Rule Making which proposes to upgrade the KPOD-FM frequency from FM Channel 250C3 to 250C2.

Any questions pertaining to this matter should be addressed to undersigned counsel.

Very truly yours



Richard A. Helmick

Enclosure

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE

Federal Communications Commission

In the Matter of)
)
Amendment of Section 73.202(b),) RM-
Table of Allotments,)
FM Broadcast Stations)
(Crescent North, California))

To: Chief, Mass Media Bureau

PETITION FOR RULE MAKING

William E. Stamps, Sr. and Patricia R. Stamps, dba Let's Talk Radio ("Petitioner"), licensee of FM Broadcast Station KPOD-FM, Crescent North, California, through its attorneys and pursuant to Sections 1.419 and 1.420 of the Commission's Rules, hereby request that the KPOD-FM license be modified to specify operation on Channel 250C2 in lieu of Channel 250C3 and that the Table of Allotments for FM Broadcast Stations, Section 73.202(b) of the Commission's Rules, be amended in accordance with such request as follows:

<u>City</u>	Channel No.	
	<u>Present</u>	<u>Proposed</u>
Crescent North, California	250C3	250C2


In support of such proposal, there is attached an Engineering Statement of W. Richard Green which asserts that the allocation proposal is fully consistent with the Commission's minimum channel spacing requirements and principal city coverage requirements. Moreover, if the proposed FM channel allocation is made, Petitioner

will expeditiously implement such allocation and request modification of the facilities of KPOD-FM.

Accordingly, Petitioner submits that its proposal would serve the public interest and the Commission is requested to issue a Notice of Proposed Rule Making to implement the instant petition.

Respectfully submitted

WILLIAM E. STAMPS, SR. AND
PATRICIA R. STAMPS
DBA LET'S TALK RADIO,
A GENERAL PARTNERSHIP

By: 
Richard A. Helmick, Esq.

COHN AND MARKS
1333 New Hampshire Ave., N.W.
Suite 600
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(202) 293-3860

Its Attorneys

December 29, 1992

ENGINEERING STATEMENT

FOR

William E. Stamps Sr. And Patricia R. Stamps

DBA: LET'S TALK RADIO, A GENERAL PARTNERSHIP

Licensee of KPOD (FM) @ Crescent North, California

W. Richard Green and Associates has been retained by LET'S TALK RADIO, A GENERAL PARTNERSHIP to prepare the engineering portion of a petition to amend the FM table of allocations.

PROPOSED CHANGES

It is proposed to change FM channel 250 at Crescent North, California from class C-3 to class C-2.

FM CHANNEL SPACING STUDY

Attached is a tabulated FM channel spacing study specifying a transmitter site located near Crescent North, California. As is demonstrated, there is complete clearance to all existing and proposed FM transmitter facilities as well as all proposed FM allocations.

Allocation Coordinates: N. LAT: 41 48 25 - W. LON: 124 10 16

PRIMARY COMMUNITY COVERAGE

A theoretical class C-2 transmitting facility located at the allocation coordinates will provide a predicted F(50/50) 70-dbu service contour over the entire Community of Crescent North, California as well as many of the neighboring communities.

SECONDARY COVERAGE

A theoretical class C-2 transmitter facility at the proposed allocation coordinates would provide service to 23,665 people and cover an area of 8,316.8 SQ kilometers within the F(50/50) 60-dbu predicted contour.

W. RICHARD GREEN & ASSOCIATES

 11/2/98/92
W. Richard Green Date

FM CHANNEL SPACING STUDY

FOR

KPOD (FM) @ CRESCENT NORTH, CALIFORNIA

Title: KPOD-FM ALLOCATION STUDY
Channel: 250-C2
Database File Name: FM921125.EDX
Database File Date: Nov. 25, 1992

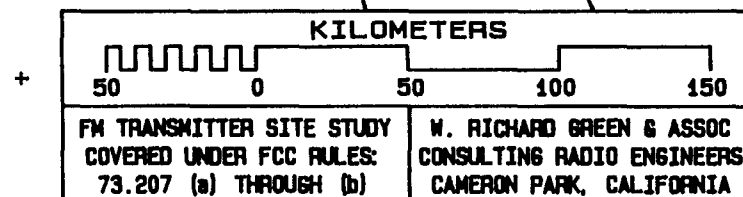
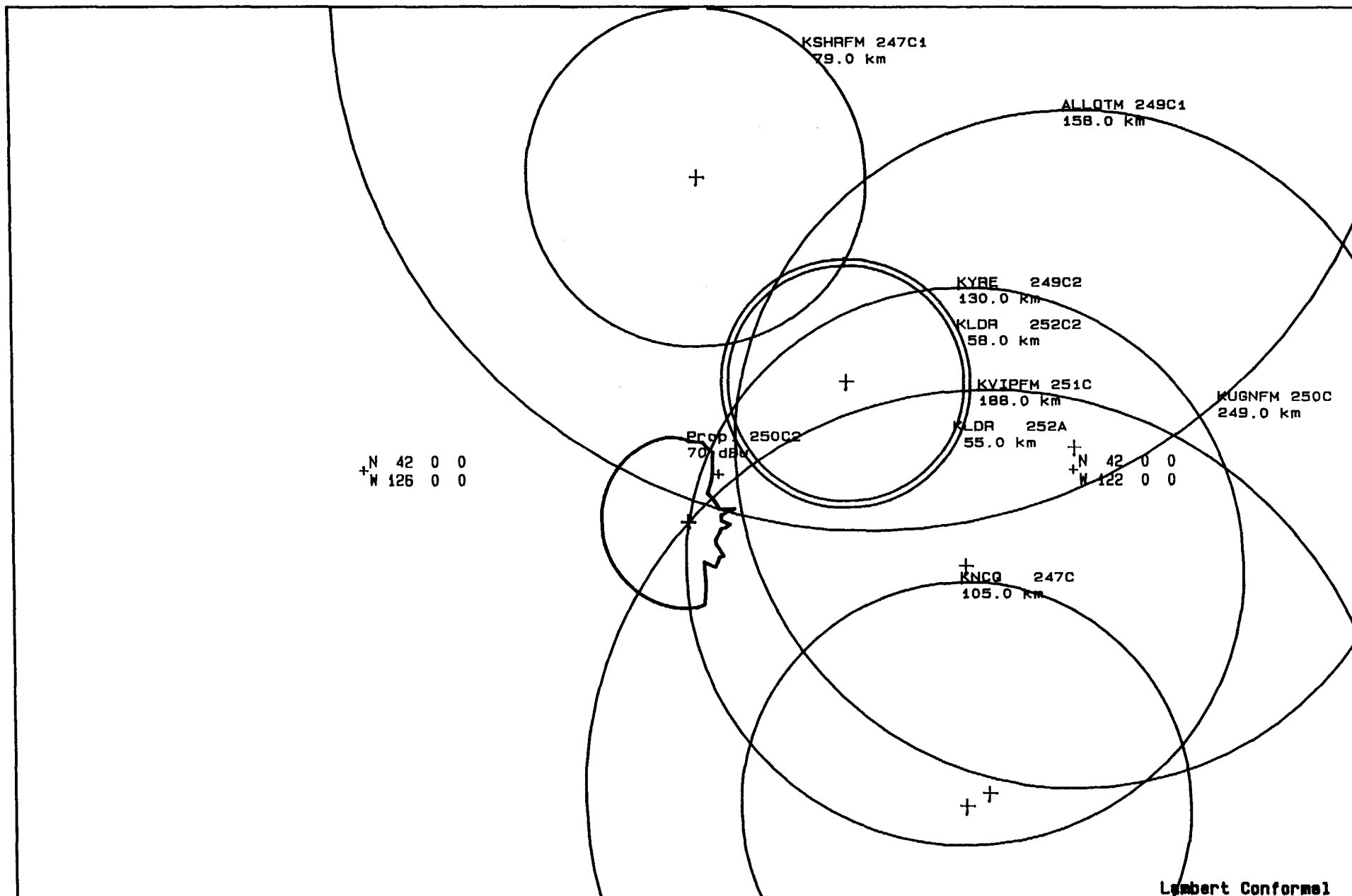
Latitude: 41 48 25
Longitude: 124 10 16

CH	Call	Record	City	ST	Status	Bear.	Dist.	Reqd. Dist.	Result
249C1		21169	Altamont	OR	VACANT	79.2	183.4	158.0	25.4
247C	KNCQ	21455	Redding	CA	LIC	135.9	184.9	105.0	
251C	KVIPFM	21475	Redding	CA	LIC	132.3	188.3	188.0	.3
249C2	KYRE	21504	Yreka	CA	LIC	99.2	130.6	130.0	.6
252C2	KLDR	21819	Harbeck-Fruitdale	OR	APP	48.8	97.9	58.0	
252A	KLDR	21830	Harbeck-Fruitdale	OR	LIC	48.8	97.9	55.0	
252C2		21846	Harbeck-Fruitdale	OR	VACANT	48.8	97.9	58.0	
250C	KUGNFM	21913	Eugene	OR	LIC	19.1	258.7	249.0	9.7
250A *	KPODFM	22225	Crescent City	CA	LIC	197.5	5.5	166.0	-160.5
250C3 **	KPODFM	22228	Crescent North	CA	CP	197.5	5.5	177.0	-171.5
247C1	KSHRFM	22268	Coquille	OR	LIC	1.7	160.1	79.0	

***** End of channel 250 study *****

* Class A Licensed Facility, Ref: FCC file No. BLH-890216-KD

** Class C-3 Construction Permit, Ref: FCC File No. BPH-900816-IB



AREA-TO-LOCATE STUDY
KPOD (FM) CRESCENT NORTH, CALIF.
December 28, 1992
Figure 1

AFFIDAVIT

State of California)
)
County of El Dorado)


William Richard Green, being first duly sworn upon oath,
deposes and says:

1. That he is owner and manager of W. Richard Green & Associates, Consulting Telecommunication Engineers located in Cameron Park, California.
2. That he is a qualified radio and telecommunications engineer of over thirty years and is engaged in this practice on a regular basis.
3. That he has completed graduate degree work at Humboldt State University, Arcata, California.
4. That his past experience includes the positions of engineer & manager at Bauer Transmitter Co. at Sacramento, California and tenured staff member at Humboldt State University at Arcata, California.
5. That his professional qualifications and experience are a matter of record with the FCC in Washington, D.C.
6. That the foregoing statement and the engineering report relating to the proposed change in the FM table of allocations for Crescent North, California are true and correct of his own knowledge and belief.


W. Richard Green

Subscribed and sworn before me this 28th day of December 1992




Notary